

1. PURPOSE OF AND NEED FOR ACTION

About this Document

In 1969, the United States Congress passed the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 et seq.). As a result, when any agency of the Federal Government proposes a "major Federal action significantly affecting the quality of the human environment", a detailed statement on the environmental impact of the proposed action must be prepared. A fresh approach to rural landscape management in Cuyahoga Valley National Park, the topic of this draft environmental impact statement (EIS), could manifest itself in a variety of ways and could have varying degrees of impact on the park's resources. As a result, NEPA was triggered and the environmental impact statement process began.

The National Park Service is required by its laws, policies, and regulations to avoid any actions that may adversely affect or impair park resources and values. This EIS process serves as a primary tool to help NPS decision-makers assess the types and levels of impacts expected from a proposed action to avoid impairment.

An EIS team comprised of National Park Service (NPS) specialists, including natural and cultural resource experts, was created to develop this document. There are six chapters in this EIS: Purpose of and Need for Action, The Alternatives, Affected Environment, Environmental Consequences, Consultation and Coordination, and References.

Chapter 1, "Purpose of and Need for Action", explains why this document is being developed; it provides the necessary background information to allow the reader to develop an informed opinion about rural landscape management in Cuyahoga Valley National Park. It consists of four main sections - Introduction, Background, Objectives and Constraints, and Scoping Process and Public Participation.

The Introduction explains in a general way the reasoning and objectives for taking an action at this time. The proposed action is the activity the park wishes to implement and is the subject of this EIS. The need for action identifies the critical problem the park is facing. The purpose of action clearly states the desired goal from taking action. The Background provides a comprehensive look at agriculture and the rural landscape and the associated management practices throughout the history of the Cuyahoga Valley Region and the national park itself. This section ends with a well-defined problem statement, which explains the need for action in a more detailed way. The Objectives and Constraints provide more detail on how the proposed action will occur, as well as the legal limitations associated with action. Finally, the Scoping Process and Public Participation section explains the public involvement process and the issues raised during that process.

Chapter 2, "The Alternatives", explains the methodology used in selecting the feasible alternatives for rural landscape management. Alternatives that were considered are

explained in detail, including associated costs. Based on the methodology, some alternatives that were suggested were not considered for analysis. This chapter also identifies the preferred alternative and the environmentally preferred alternative. The preferred alternative is not required to be the environmentally preferred alternative.

Chapter 3, "Affected Environment", provides a description of the areas of the environment that will be affected or created by the alternatives. There are some mandatory topics that must be considered as part of the affected environment, including wetlands, threatened or endangered species, floodplains, and more.

Chapter 4, "Environmental Consequences", addresses the impacts associated with each of the alternatives. Direct, indirect, and cumulative impacts are examined.

Chapter 5, "Consultation and Coordination", contains a description of public involvement, the list of preparers and their expertise, and a list of recipients of the final EIS.

Chapter 6, "References", contains a list of common acronyms, a glossary, a bibliography, an index of key words, and the appendices.

1.1. INTRODUCTION

1.1.1. Proposed Action

Cuyahoga Valley National Park (CVNP) is proposing to implement a fresh and more proactive rural landscape management program. A rural landscape is characterized by a large acreage of land with a relatively small number of structures (NPS 1996). In turn, the rural landscape reflects the day-to-day occupational activities of people engaged in traditional work. These traditional occupational activities include agriculture, mining, lumbering, and other similar activities. For the purposes of this EIS, CVNP is focusing on the agricultural element of the rural landscape. Thus, throughout this document, the term "rural landscape" refers to lands and structures modified by humans for farming or agricultural use.

Preservation of the rural landscape is central to CVNP's legislative mandate. The park's mandate includes the "preservation of the historic, scenic, natural, and recreational values of the Cuyahoga Valley" (Public Law 93-555, 1974). The rural landscape contributes to the historic and scenic values of CVNP. But despite various attempts to stem the decline of the rural landscape within the park's boundaries, many of the farmsteads have fallen into disuse and disrepair. As a result, CVNP is proposing to better protect and revitalize this cultural resource by implementing an integrated rural landscape management program. This EIS examines several possible alternatives to achieve this goal while protecting park resources and values from impairment.

1.1.2. Need for Action

Areas of agricultural open space are quickly disappearing in Ohio. The same can be said of open lands within CVNP. While there are few development pressures within the park, natural succession continues, so areas that once were used for agriculture are fast becoming unrecognizable. Associated farm structures, such as farmhouses and barns, are being lost to deterioration.

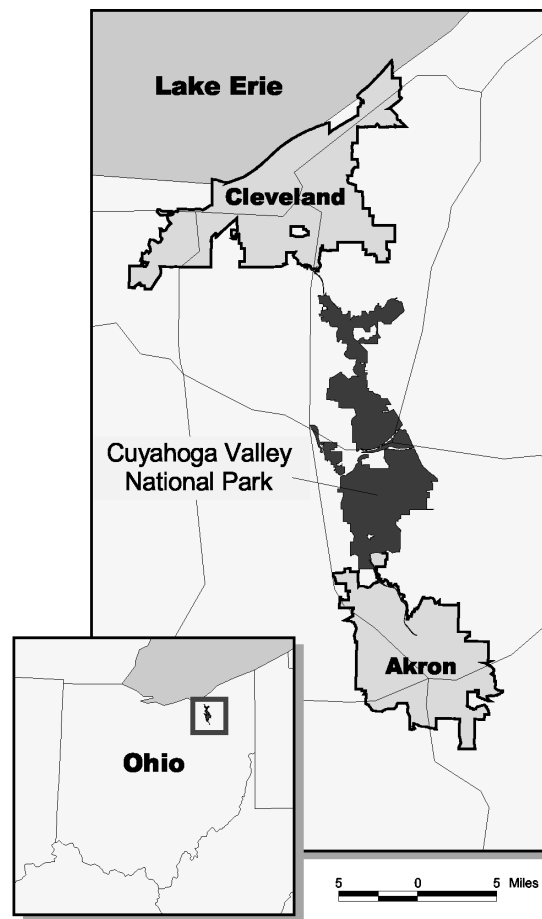
Rural landscape management has been addressed in various park-planning documents and has been implemented to varying degrees, but it has not been achieved to its full potential. Throughout the park's existence, despite rural landscape management efforts, many of the park's rural landscape resources have been lost. A need for better protection and management of these park resources exists.

1.1.3. Purpose of Action

The purpose of a fresh and more assertive approach to rural landscape management is to more effectively and systematically preserve and protect rural landscape resources in Cuyahoga Valley National Park. The objectives that must be met in order to achieve this goal are: 1) preserve the agricultural tradition, 2) preserve scenic values, and 3) use environmentally sound practices.

1.1.4. Project Location

Cuyahoga Valley National Park is one of 388 parks in the National Park System. It encompasses approximately 33,000 acres of relatively undeveloped land along 22 miles of the Cuyahoga River between the metropolitan areas of Cleveland and Akron, Ohio. Within the legislative boundary, the NPS owns approximately 18,500 acres. The remainder of land is owned and under management by other public or quasi-public entities, or remains in private ownership. Management of the rural landscape on the



Location of Cuyahoga Valley National Park, Ohio.



A historic view (1913) of the heart of Boston Township showing the railroad tracks, bridge over the Cuyahoga River, and surrounding structures amongst farmed fields. These farmed fields no longer exist although other features are still recognizable.

federally-owned acres within park boundaries is the focus of this EIS.

1.2. BACKGROUND

1.2.1. The History of Agriculture in the Cuyahoga Valley Region

The Cuyahoga Valley Region, which extends well beyond the boundaries of CVNP, can be defined in many ways, but the most distinguishing features of the valley are its walls to the east and west, and the northern terminus of the Cuyahoga River at Lake Erie. However, regardless of how the valley is defined, it is an area rich in agricultural heritage.

For nearly 12,000 years, human beings have had a presence in the Cuyahoga Valley. Stories of prehistoric and historic people are told in the archaeological remains found throughout the valley. It is not known exactly when farming in the valley began, but limited farming practices probably began as early as 600 AD with the late Woodland culture, although there is no direct evidence of this (Richner 2001). However, there is archaeological evidence of agricultural practices by the Whittlesey culture in the Cuyahoga Valley starting in 1050 AD and lasting though about 1600 AD. Burned seeds and burned corncobs were found near the Canal Visitor Center in the northwest section of the park. There is also evidence that squash and common beans were grown in that area.

It is certain that for approximately the past one thousand years, there has been some form of agriculture in the valley (Richner 2001). Extensive research has been done about archaeology and agriculture in the valley, but only a small portion of this information is presented here. Detailed information can be found in the following documents: *Archaeological Investigations in the Cuyahoga Valley National Recreation Area* (Brose 1981), *Agricultural Resources of the Cuyahoga Valley Multiple Property Documentation Form* (NPS 1992a), and *Cultural Landscape Thematic Overview and Methodology Guide* (for Cuyahoga Valley National Recreation Area) (NPS 2000a).

Shortly after the end of the influence of the Whittlesey culture, European contact with this region began. It was in 1669 that LaSalle began his exploration of the area. Continued exploration and settlement over the next century led to the formation of the Connecticut Western Reserve in 1786. The Western Reserve, which was comprised of the land south of Lake Erie and north of the 41st parallel, contained the land that was later to become part of the state of Ohio, in 1803. Many Irish, German, and Polish immigrants were lured to Ohio because of what seemed to be limitless agricultural land and other work opportunities (NPS 2000a, p.10). As a result, farming in Ohio, particularly in the Cuyahoga Valley, was very prosperous in the 1800s.

There were two major factors that contributed heavily to the prosperity of the farms in the valley: the creation of the Ohio & Erie Canal and the development of the railroad system. The canal, which was completed in 1832, provided farmers with a way to deliver their agricultural products to Lake Erie in considerably less time than in the pre-canal days. Shorter delivery time meant less spoilage, which meant greater economic returns for the farmers. Beginning in the 1880s, the railroad, which was faster, cheaper, and more dependable because freezing and flooding were not concerns, made agriculture even more efficient and prosperous. The 1860 agricultural census figures indicate that Ohio



A typical farmed field in the Cuyahoga Valley (1917).

was a national agricultural leader. Ohio ranked 2nd in the country in cash value of farms, and 3rd in acres of land in farming (NPS 1992a, p.5).

Farming practices and farming-related industries dominated the 19th century and evolved considerably during that time in the Cuyahoga Valley Region. Eventually though, developments in agriculture in other parts of the state and the country surpassed the developments in the valley, so farming in the valley began to decline. The large-scale farms of the west made it difficult for the farmers in Ohio to compete. In addition, the industrial boom in the cities of Cleveland and Akron enticed farmers out of the countryside and into the cities in search of greater income.

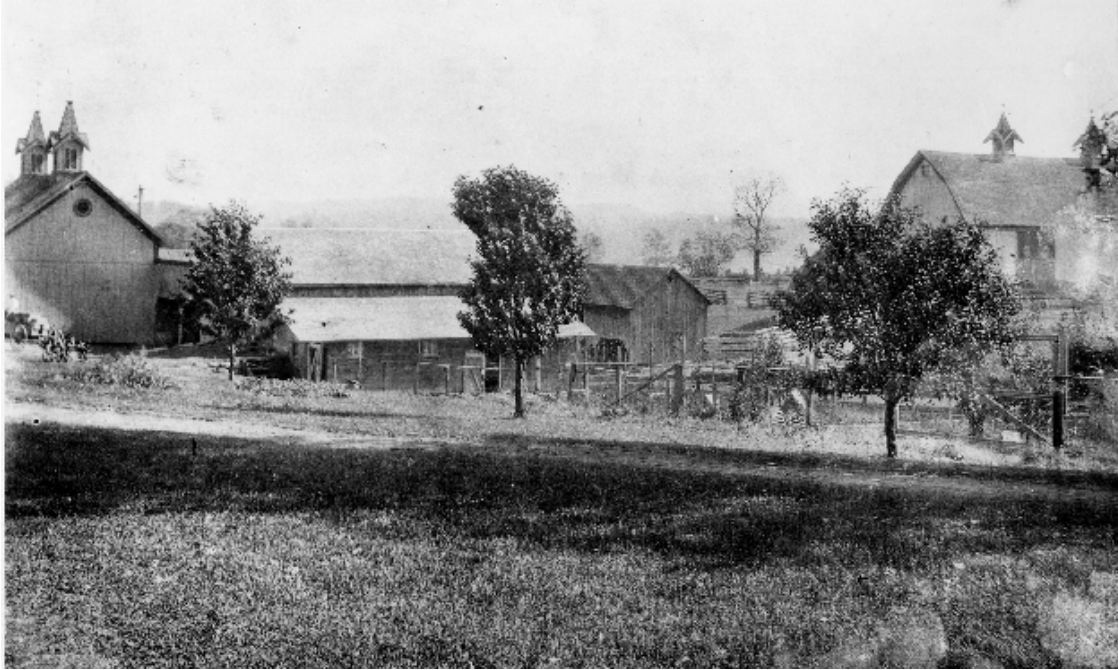
As a result, farming in Ohio has been in decline. According to the U.S. Census of Agriculture, 28.7 percent of Ohio's land in farms was converted to non-agricultural use from 1954 to 1992, with farmland acreage dropping from 19.9 million to 14.2 million (Ohio Department of Agriculture 1997). This trend has been particularly strong in increasingly urbanized Northeastern Ohio. Between 1950 and 1997, farmland in Cuyahoga County declined by 92 percent (Ecocity Cleveland 2003). With only 6,000 acres of farmland remaining in 2001, the county ranks last among Ohio's 88 counties in farmland acreage (Ohio Department of Agriculture 2001, Table 8). Similarly, Summit County lost 84 percent of its farmland over the same period and ranks 86th among Ohio counties, with only 18,000 acres of farmland remaining in 2001. Similar declines in the number of farms have also been documented for both counties.

Conversion to urban and suburban uses has been clearly identified as the primary threat to these lands (Ohio Farmland Preservation Task Force 1997, Kaplan et al. 2001). The Cuyahoga Valley was spared somewhat because the area's unstable glacial slopes and wet, clay soils helped buffer the valley from extensive development (NPS 1992a, p.10). In addition, the availability of potable water has always been limited (Debo 2001).

Another factor in the protection of the Cuyahoga Valley from development pressures was the creation of Cuyahoga Valley National Recreation Area in 1974. Approximately 33,000 acres of national park land were set aside to "preserve and protect the historic, scenic, natural, and recreational values of the Cuyahoga River and the adjacent lands of the Cuyahoga Valley" (Public Law 93-555). But, even though development was on the rise and agriculture was on the decline in the region, some small farms still existed within the boundary of the new national park.

1.2.2. The Evolution of Rural Landscape Management in CVNP

As the park was being established in the mid-1970s, resources, including agricultural lands and structures, were quickly being purchased through federal land acquisition procedures with the primary focus of protecting land from development pressures. Once acquired, farm structures and farm fields were not given priority attention. Most of the farm buildings were allowed to stand vacant and deteriorating, and farm fields were untended and prone to ecological succession. While undeveloped lands in natural condition were seen to benefit from this "hands off" management strategy, farm



A historic view (1900) looking northwest at the Waterman Farm, currently known as Heritage Farms. This farm is within park boundaries but is still privately owned and operated by the Haramis family. The park has an agricultural easement on the property to help promote the continuation of farming in the Valley.

properties suffered severe negative impacts. Attempts to address this shortcoming in rural landscape management were slow and haphazard, and usually occurred in a very opportunistic fashion. This approach was generally common across the National Park System at the time, as no good model for managing agricultural lands in national parks was available at that time.

Leaving the newly acquired buildings vacant made them difficult to maintain, so initially some of them were used for temporary employee housing. When this practice ended in the mid-1980s, longer-term building use was evaluated with historically significant buildings given priority for utilization. CVNP rehabilitated some of the buildings for park operations and entered into agreements with individuals or park partners for the use of other buildings. Buildings that did not have a proposed use, particularly the non-historic buildings, were instead targeted for demolition or were neglected and subsequently deteriorated.

Not only were buildings in jeopardy, but so too were the associated lands. The fields were either threatened by potential development pressures or were overgrowing. In order to alleviate development pressures, the park acquired agricultural easements from private property owners within the park boundary who appeared to have viable and longstanding enterprises. These agricultural easements restricted the active use of those fields to agricultural use for perpetuity. These six easements prevented development on 250 acres.

In the 1980s and 90s, CVNP initiated several additional efforts to manage agricultural fields so that the approach to rural landscape management would be less opportunistic. Some of these efforts led to subsequent action, while many did not. In the early 80s, approximately 400 acres of land were designated as open space to be maintained either through agriculture or mowing. Farmers who were interested in using some of those 400 acres for agriculture were issued short-term leases. Contractors mowed the remaining field acres. In the early 90s, agricultural leasing workshops were held, which led to the suggestion that the park expand the number of acres to be maintained as open space from about 400 to 1000. A study was done in 1991 that led to the development of a map that depicted the preferred action for many of the open fields in the park. The potential uses included agricultural use, pasture, haying, mowing, and natural succession. However, throughout the 90s, the demand for leasable, farmable land in the park was generally quite low. So in order to keep some level of agriculture in the park, whenever a local farmer requested the use of a field, a short-term lease was typically granted. It is expected that as the local farmer population ages and farms outside the park are developed, that the demand for short-term leases by non-resident farmers will continue to decline.

The most recent effort to address rural landscape management is probably the most significant. In order to develop CVNP's first long-term, comprehensive, agricultural plan, park managers conceptualized the creation of a new program called the Countryside Initiative. This program would potentially work to rehabilitate structures and restore not only the agricultural lands still surviving in the park, but also the 'sense of place' commonly associated with the Cuyahoga Valley.

To help develop and facilitate this program, the park assisted with the formation of a nonprofit partner, the Cuyahoga Valley Countryside Conservancy (CVCC). The park has established a Cooperative Agreement with the CVCC. CVNP, in cooperation with the CVCC, advertised a Request for Proposals in January 2001 for five farmsteads that were to be farmed using sustainable agriculture practices. The park has recently negotiated three leases as a pilot project for the new Countryside Initiative. The expansion of this small pilot program is outlined as Alternative 2 (the Preferred Alternative) in this document.

1.2.3. Farming in CVNP Today

Today, despite sporadic attempts at rural landscape management, the agricultural heritage of the Cuyahoga Valley Region continues to some degree within park boundaries. Farming and other agricultural activities still occur on both federal and non-federal parkland. Currently, a total of approximately 1,180 acres of the national park (3.6 percent) are farmed. All agricultural activity within the park is depicted on the maps at the end of Chapter 2.

Private farmers or other groups on non-federal lands conduct half of this farming (590 acres). Private farms primarily consist of cornfields, conifer trees, pumpkin patches, hay fields, and horse pastures. One such operation, Hale Farm & Village, includes approximately 44 acres of farmland. It is managed by Western Reserve Historical



This upland cornfield depicts typical current agricultural use in the park under special use permits.

Society as a living history farm set in the year 1848. Additionally, approximately 40 acres owned by Metro Parks, Serving Summit County are currently leased for corn production to a local farmer. Cleveland Metroparks also manages the Brecksville [Horse] Stables in the Brecksville Reservation consisting of approximately seven acres. Some of these private lands continue to be farmed in part due to agricultural easements held by the NPS (250 acres). Agricultural use on easements consists primarily of conifer and deciduous tree farms, daylily farms, pumpkin patches, and cornfields.

Several farmers currently operating within the park boundaries not only farm on their own private land, but also supplement their enterprises by using federal land. These operations include, among others, Heritage Farms, Carriage Trade Farms, Luther Farms, Swan Farm, Polcen Farm, and Szalay's Sweet Corn Farms. Approximately 590 acres of federal land are farmed under various agreements that are detailed in Section 1.2.4.5. Most of these areas are leased to absentee farmers for use in their operations. Most fields are planted in crops such as corn, hay, pumpkins, alfalfa, oats, and conifer trees, with corn and hay being the most prevalent. Some fields are used as pastures for horses, dogs, sheep, or goats. Most operations are either primarily crop or livestock-oriented although a few integrated crop/livestock operations are being implemented. These integrated farms focus on a specific type of farming such as vineyards, berries, herbs, poultry, or perennial flowers, but then incorporate other crops or livestock.

1.2.4. *Management Objectives and the Rural Landscape*

1.2.4.1. Introduction

Section 1.1.2 mentions that rural landscape management is addressed in various park-planning documents, but that it has not been achieved to its full potential. This section is an examination of those park-planning documents and their guidance on rural landscape management. Overall guidance on NPS management objectives is provided for in the *Management Policies* (NPS 2001e), *Cultural Resources Management Guideline* (NPS 1997a) and *Natural Resources Management Guideline* (NPS 1991). This section provides the basis for answering the fundamental questions of *how* and *to what extent* should farming occur in CVNP and it provides the framework for understanding the components of the alternatives in the next chapter.

1.2.4.2. The National Park Service Mission and Policies on Preserving Rural Landscapes

The mission of the NPS is to “promote and regulate the use of Federal areas known as national parks, monuments and reservations . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (16 U.S.C. 1).

The NPS *Management Policies* state that “cultural landscapes will preserve significant physical attributes, biotic systems, and uses when those uses contribute to historical significance” (NPS 2001e, p. 56). Furthermore, when land use is a primary reason for the significance of a landscape, the objective will be “to balance the perpetuation of use with the retention of the tangible evidence that represents its history”. Protection of the properties in cultural landscapes, especially historic properties, is mandated by NPS policy.

One historic land use in national parks is agriculture. Agricultural properties that once contributed to a cultural landscape may be preserved, rehabilitated, or restored through agricultural uses. A recent survey of NPS units identified 90 parks that have agricultural landscapes that comprise a significant component of the overall park cultural landscape (McEnaney 2001). Agricultural uses in parks are permitted “in accordance with the direction provided by a park’s enabling legislation and general management plan” (NPS 2001e, p.93).

The policies further state that agricultural activities, including demonstration farms, prescribed to meet a park’s management objectives, will be allowed if they “do not result in unacceptable impacts on park resources, values, or purposes, conform to activities that occurred during the historic period, and support the park’s interpretive themes” (NPS 2001e, p.93). Agricultural uses that do not conform to those in practice during the historic period may be allowed if they “contribute to the maintenance of a cultural landscape” or

"are carried out as part of a living exhibit or interpretive demonstration" (NPS 2001e, p.93). The NPS may also allow livestock use "when required in order to maintain a historic scene".

1.2.4.3. Rural Landscape Management Planning in CVNP

Congress created Cuyahoga Valley National Recreation Area (now Cuyahoga Valley National Park) in 1974 for the purpose of "preserving and protecting for public use and enjoyment, the historic, scenic, natural and recreational values" of the Cuyahoga Valley, thereby maintaining "needed recreational open space necessary to the urban environment" (Public Law 93-555). Park managers were directed by Congress to use the park resources "in a manner which will preserve its scenic, natural, and historic setting while providing for the recreational and educational needs of the visiting public".

One significant scenic and historic park resource discussed throughout early park planning documents is the rural landscape. In the park's first planning efforts, a draft *Environmental Assessment* (EA) for the *General Management Plan* (GMP) was completed (NPS 1976). One of the requirements when preparing an EA is that public comments be gathered and considered. In terms of the management goals to be included in the GMP, one of the primary goals suggested by the public was a recommendation that the park "preserve agricultural lands and the traditional rural atmosphere, lifestyles, and traditions of the Cuyahoga Valley" (p.3), in other words, a 'sense of place'. Specific objectives under this goal included taking "appropriate actions to perpetuate agricultural open space and related land uses in the valley" and supporting "traditional farming-related activities". Another goal was to "preserve significant cultural resources" with an expressed objective to "stabilize, restore, or reconstruct significant historic and prehistoric sites and structures". These suggested goals were explicitly incorporated into a refined and restated set of management objectives for the park. The preservation of all historic and cultural resources, including agricultural lands and activities, was combined into one generalized objective: "To preserve significant historic or prehistoric sites and structures" (p.103).

The concept of 'sense of place' was not articulated as such when the park's initial planning documents were being drafted, but the concepts expressed above can be combined into today's more commonly used and understood phrase... 'sense of place'. The National Trust for Historic Preservation defines 'sense of place' as those things that add up to a feeling that a community is a special place, distinct from anywhere else (Stokes et al. 1997). When the federal government protects an area as part of the National Park System, this defining characteristic – being distinct from anywhere else – is an important criterion.

As goals and objectives for park management began to take shape, so too did the alternatives for the implementation of the GMP. Certain actions were associated with each alternative, but several actions were considered to be common to *all* alternatives for managing CVNP. These actions would be taken regardless of which park management

plan alternative was finally implemented. One action stated "where possible, all lands currently in agricultural production will remain so under agricultural easement" (p.111). Additionally, when the final *General Management Plan* (NPS 1977) was adopted, the cultural resource management section noted that "the rural character of America is readily communicated in the agricultural landscapes that have survived to the present day. These and other valuable resources suggest both careful preservation and imaginative interpretation to ensure that they become an integral part of the Cuyahoga environment" (p.35). Indeed, agriculture is also presented as an important historical theme for interpretive programs (p.44). The preservation of agriculture in the park was clearly one of the guiding principles for general park planning.

The park's most recent *Statement for Management* (NPS 1993c) reiterates the need to protect the rural landscape by outlining specific objectives. These objectives include the need to "creatively develop uses for the various historic structures that presently stand vacant or that will become vacant in the future as retentions and/or life estates expire". Another objective states the need to "continue to expand/improve the cultural landscape preservation effort at Cuyahoga Valley. Research followed by appropriate implementation is required to meet the recommendations outlined in the park's [Cultural Landscape Report]" (p.52).

Lastly, the park's *Resources Management Plan* (NPS 1999) includes specific goals and objectives for protecting cultural resources, including Goal 11C - "Encourage agricultural use of designated parklands to preserve this culturally significant land use pattern." Two objectives under this goal are to "develop a management strategy that enables economically viable farming consistent with park's cultural and natural resource values" and "utilize historic farmhouses, barns, and outbuildings as part of farming operations".

1.2.4.4.Documenting and Managing the Rural Landscape in CVNP

The *General Management Plan* (GMP) mandated an inventory of cultural resources to specifically identify and evaluate all resources requiring preservation. To achieve this goal, the park developed several key documents. The park first developed a *Land Protection Plan* (LPP) (NPS 1984) to describe resource preservation goals and methods. The LPP states that "land historically used for agricultural purposes within the recreation area represents an important cultural resource which must be protected" (p.25). The LPP recommended protecting specific tracts of land through agricultural easements, acquisitions, and leaseback for farming. (A thorough explanation of these and other CVNP rural landscape management methods is in Section 1.2.4.5.) The LPP is periodically updated, most recently in 1994.

In 1982, the first *Building Utilization Plan* (BUP) was written (as cited in NPS 1994). This plan was updated in 1986 (as cited in NPS 1994) to include an inventory of park buildings and an analysis of requirements for proposed building uses. This plan also identified a phased strategy to preserve and use buildings that contributed to the park's purposes as stated in the enabling legislation. In 1994, the plan was again updated to

recommend a management strategy for every NPS-owned building in the park. Specifically, the buildings were inventoried to determine historic significance, scene-setting value, public use potential, or potential for administrative use. Buildings that contributed to the scenic, historic, or cultural values of the park were given priority for utilization.

In 1987, a *Cultural Landscape Report* (CLR) was completed to "identify the cultural landscape...and to recommend methods of protecting this important historic and scenic value" (NPS 1987a, p.1). Agriculture was one of six primary cultural landscape themes identified in the document. Noted of special importance is the "preservation of former farm fields". The CLR states that these areas "must be kept open to evoke the rural character for which the [park] was created, in part, to preserve" (p.1). The CLR suggests that "historic agricultural buildings which remain should be rehabilitated" and "the associated farm fields should be leased for agricultural production or, at minimum, be regularly mowed to keep them open" (p.23). The CLR lists all tracts that "historically contribute" to the agricultural theme of the park, and prescribes active management through continued agricultural use, mowing, and also allowing some areas to proceed into succession.

Currently, an update of the CLR is underway. The *Cultural Landscape Thematic Overview and Methodology Guide* (NPS 2000a) was published in April 2000 to outline the goals of the new document. In particular, the updated CLR will be divided into sections to address each specific historical theme that helps to define the cultural landscape of CVNP. The historical themes include Prehistoric and Indigenous Cultures; Settlement; Transportation; Agriculture; Industry; and Recreation. Draft versions of thematic CLRs for Transportation and Agriculture are being prepared at this time.

The NHPA requires the creation of a Cultural Landscape Inventory. The goal at CVNP is to document and evaluate the cultural landscapes that may have National Register eligibility. Currently, priority is being given to agricultural properties. Full descriptive reports have been completed or drafted for the Point, Jyurovat, Vaughn, and Parry farms.

1.2.4.5. Current Rural Landscape Management Methods in CVNP

Today, the rural landscape in CVNP is managed by a combination of management methods. The following is a list of the rural landscape management methods currently used in CVNP. A summary of current rural landscape management methods and the number of acres and structures associated with each are found in Table 1.2, at the end of this section. Appendix A contains a full inventory of all structural components of the rural landscape in CVNP including the tracts, properties, and structures, and how they are currently managed. The maps at the end of Chapter 2 depict the locations of these lands and structures. The leasing of NPS structures and properties is authorized under 16 U.S.C. 1 - 3, 16 U.S.C. 460l-22(a), 16 U.S.C. 470h-3, and 36 CFR parts 17 and 18.

Agricultural Easements: Currently, the same six agricultural easements mentioned in Section 1.2.2 exist, consisting of approximately 250 field acres and 17 structures.

Land Exchange: One farmstead consisting of seven structures, the Edward Cranz Farm, was traded to Hale Farm & Village under a land exchange authority which permits the NPS and other governmental agencies within the park to trade lands in order to meet mutual goals. The fields associated with this property were not owned by the NPS. Since this farm is listed on the National Register of Historic Places, a restrictive covenant accompanies the land exchange agreement to provide for future NPS management interest in the property.

Special Use Permits (SUP): SUPs assigned to absentee local farmers account for the majority of federal land presently in agricultural use. SUPs are managed according to NPS Director's Order 53: Special Park Uses. Most fields are hayed or planted in crops such as corn or oats (Table 1.1). Few livestock or equestrian operations exist and even fewer integrated crop/livestock operations exist. Several acres are also maintained as lawn. Most SUP farmers use conventional farming practices and crops, although more sustainable or organic practices have been used occasionally. In 2001-2002, approximately 461 acres of field were maintained through the issuance of 19 SUPs. Two of these 19 SUPs also permit the use of four buildings for agricultural purposes. In addition, seven SUPs lease 11 farm buildings for strictly residential purposes. The number of SUPs and total acreage leased changes dynamically as SUPs expire or are renewed with minor revisions. Agricultural field management often fluctuates between SUPs and NPS mowing (i.e., Vista Management).

Table 1.1. Crops and Other Uses of 2001-2002 Agricultural Special Use Permits

<u>Crop / Cover*</u>	<u>Fields</u>	<u>Acres</u>
Christmas Trees / Pumpkins	3	5
Corn	22	182
Equestrian Uses	7	50
Hay (including alfalfa)	17	176
Hay & Corn / Oats / Winter Wheat	2	31
Herbs / Chickens	1	2
Lawn	2	5
Oats	<u>1</u>	<u>10</u>
Total	55	461

*Uses as reported by 2001-2002 SUP holders through personal interviews (June 2001) and 2001 pesticide applications. Actual SUPs, acreages and crop rotations may have varied slightly.

Memorandum of Understanding (MOU): One MOU exists with The Humane Society of Greater Akron for the use of a farmstead including six buildings as well as the immediately associated field consisting of approximately three acres.

Concession Contracts: The Cuyahoga Valley Hostelling International - Stanford House is the park's only concession contract. It is for the joint use of two historically related farmsteads. The five buildings and surrounding residential lands are included in this contract. No associated fields are utilized.

Cooperative Agreements (CA): Two CAs related to farm properties are currently active in the park. The first agreement, Woodlake Field Station, is authorized only to use the farmhouse; the second agreement, CVCC, is authorized to use the entire farmstead, including three farm buildings as well as the immediately associated fields containing approximately 30 acres. These fields are to be used for agricultural purposes.

Historic Property Leasing Program (HPLP) Leases: Six HPLPs utilize old farm properties on terms ranging from 25 to 50 years. Twenty-three buildings are utilized, however, only one agreement also involves the use of an associated field, The Conrad Botzum Farmstead. This field is approximately 15 acres and will be used primarily for agricultural-related purposes. Other examples of HPLP establishments include the Inn at Brandywine Falls and The Crooked River Valley Inn and Conference Center.

New Leasing Regulations (NLR): Three farmsteads using 4 properties containing 10 structures and approximately 70 field acres are leased under a recently revised leasing authority (36 CFR 18; see Appendix F) for the Countryside Initiative pilot project. Sustainable agricultural use is required as part of the project. These farms are just beginning operations in 2002 with plans for two integrated livestock and crop operations and a vineyard. For the purposes of this EIS, these lands and structures are considered currently managed, despite the temporary lack of farming activity on some lands at this time.

Non-Historic Leases: One non-historic lease exists for five buildings and the associated field of approximately eight acres, the Briar Rose Farm. Use is restricted to residential and equestrian unless approved by the NPS.

Park Utilization: CVNP still maintains and utilizes many of its own farm buildings and lands. For instance, 44 farm-related structures such as houses, barns, and outbuildings are currently maintained through various park operational uses. These operations include administrative and support facilities such as offices, ranger stations, maintenance facilities, visitor facilities, temporary housing, and storage. The park also utilizes 11 structures simply as scene-setters. These typically consist of smaller farm outbuildings, such as privies or corn cribs.

Vista Management: CVNP maintains remnant agricultural fields through clearing and mowing. CVNP crews are primarily responsible for field maintenance although

contractors or volunteers may be utilized. Fields are generally mowed two times per growing season to control succession unless they are in high visitor use areas where a weekly mow is implemented. Clearing occurs as needed when the regular mowing cycle has been interrupted and known fields have become overgrown. Twenty-four fields comprising approximately 150 acres are maintained through mowing (NPS 2001f).

Additionally, the maintenance of certain habitat types (e.g., meadows, fields, prairie) expressly for native plants and wildlife could contribute to maintaining the appearance of agricultural open space in some cases. While natural processes are usually relied on to maintain native plant and animal species, the NPS may actively manage these ecosystem components when necessary and appropriate (NPS 2001e, p.34). In these situations, mowing schedules would be established to maintain optimum habitat for the species of interest. Currently, CVNP does not actively maintain open space in this manner but proposals to do so are included in the proposed action.



This barn is a contributing feature of the historic Jim Brown Farmstead. This farmstead is currently leased under HPLP and is being rehabilitated as a part of the Crooked River Valley Inn and Conference Center which will provide overnight accommodations. View looking northeast.

Table 1.2. Summary of Current Rural Landscape Management on Federal and Non-federal Land in Cuyahoga Valley National Park, Ohio**Non-Federal Land****Agricultural Open Space**

<u>Management Method</u>	<u>Acres</u>
Agricultural Easements	250

Structures

<u>Management Method</u>	<u>Total</u>
Agricultural Easements	14
Land Exchange	7

Total	21
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Federal Land**Agricultural Open Space**

<u>Management Method</u>	<u>Acres</u>
Special Use Permits	461.3
Memorandum of Understanding	3.3
Cooperative Agreements	30.3
Historic Properties Leasing Program	15.1
Non-Historic Lease	8.2
New Leasing Regulations	55.8
Vista Management	<u>150.4</u>

Total	738.6
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Structures

<u>Management Method</u>	<u>Total</u>
Special Use Permits	20
Memorandum of Understanding	6
Concessions Contract	5
Cooperative Agreements	4
Historic Properties Leasing Program	23
Non-Historic Lease	5
New Leasing Regulations	10
Park Utilization	46
Scene-setters	<u>11</u>

Total	130
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1.2.5. Problem Statement

Park managers faced rural landscape management challenges from the onset. At the time the park was created, small working farms still existed in the valley, but many were in declining condition and had been for several prior decades. Farmsteads, which were suddenly located within national park boundaries, were being converted to other purposes that did not necessarily coincide with the mission of the park. So to protect these lands and structures from the potential threat of future development, the NPS acquired them. But NPS ownership did not necessitate agricultural or any other use. Management components necessary to keep the acquired farmsteads in active use were not in place early in the park's history. As a result, many of the farm fields were lost to natural succession processes or natural wetland restoration processes, and many of the buildings deteriorated or were demolished. Thus, the entire rural landscape has diminished over time and the valley's 'sense of place' was diminishing as well.

Preserving the rural landscape has always been a component of park management objectives, but it has been difficult to achieve because to date, no comprehensive approach has been developed to guide the management of the rural landscape. Rather, many different CVNP documents developed since the establishment of the park have proposed methods for managing certain elements of the rural landscape. This conglomerate of documents and management methods, described in the previous two sections, lacked focus. In turn, this lack of focus hampered the park's ability to utilize limited staff and funds efficiently and effectively for rural landscape management.

Several specific problems exist with the current methods that have been used by the park for rural landscape management. For instance, agricultural easements are expensive as the park purchases the development rights of the land to thwart any future development. Administration of the easements is also difficult since there are no on-going incentives for the private owner to cooperate with park goals. In addition, the easements do not protect against fields being lost to succession if the private owner should decide not to continue farming. The agricultural restriction relates only to allowable "active" use of the land. Thus, while agricultural easements are effective tools to prevent development of private property, they do not ensure the active pursuit of agricultural practices.

In the case of short-term agreements, the short-term nature itself is often detrimental. Since there is no long-standing commitment with the agreement holders, it is difficult to encourage capital investment or long-term stewardship. For buildings, this often results in minimal care and decline over time. For land, quick returns are sought which typically means monoculture crops of limited varieties are planted. These crops deplete the soil of nutrients, increase erosion, and homogenize the rural landscape scene. Dependence on chemical use is also common. Administering short-term agreements is also a laborious and expensive task for the park. Agreement turnover is high, as is the rate of renewal. Plus, the park receives less than market value for properties since these agreements are for short periods of time. Lastly, the concern exists as to whether or not the short-term use is actually the most appropriate use for meeting long-term park goals.

Of the various types of long-term agreements, the park has traditionally utilized the Historic Properties Leasing Program (HPLP) and non-historic leases in managing the rural landscape. Although somewhat successful, these types of leases are limiting. For instance, HPLP requires a leased property to be listed in the National Register of Historic Places, and the Secretary of the Interior's Standards for Historic Preservation must be followed. Non-historic leases, on the other hand, are issued on a lowest-bid basis, which decreases the park's ability to specify a preferred use of the property.

With the passing of the New Leasing Regulations, new long-term leasing opportunities exist that remove past limitations. For instance, historic *and* non-historic properties are both eligible for leasing through a request for proposal process. This allows the park to ensure specific uses for an increased number of properties including those that are and are not eligible for the National Register.

A continuing concern for park managers is that the number of buildings in the park, rural landscape-related or otherwise, exceeds the spatial needs for park utilization. Even when combined with short-term and long-term agreements, many buildings remain vacant and without a use. Without a use, it is unlikely that a structure will be rehabilitated, thus it may be destined for decline and eventual removal.

As part of vista management, the park currently manages many abandoned farm fields through mowing. Mowed, open fields provide rural character despite the fact that no agriculture is present. This lack of agriculture can at best maintain only an appearance of agriculture, as the traditional activity is not depicted. In addition, CVNP has not been able to mow all fields that have contributed to the rural landscape overtime. Thus, many fields have been lost to succession.

Lastly, CVNP has not typically managed farm structures and lands in a combined effort. Rather, buildings tend to have a specified use independent of the specified use of the land. There are only a few examples in the park that currently use the farm structures and associated lands jointly. Thus, overall, the image that is created is one of a fragmented, often derelict, landscape, rather than one of a cohesive image of a working, lived-in, rural landscape.

1.3. OBJECTIVES AND CONSTRAINTS

1.3.1. Objectives

Chapter Two of this document explains the alternatives that will be analyzed. In order for an alternative to be analyzed in this EIS, it had to meet the stated objectives; otherwise, it was dismissed (see Section 2.9).

The objectives listed here elaborate on the previously stated purpose of action found in Section 1.1.3. The purpose of this rural landscape management EIS is:

To implement a comprehensive management program that will more effectively and systematically preserve and protect the rural landscape resources in the park.

The preferred rural landscape management approach at Cuyahoga Valley National Park will...

1. *Continue the agricultural tradition* –Agricultural activity, or the appearance thereof, must be preserved in order to maintain agricultural open space and promote the historic character of the Cuyahoga Valley. Either active farming or open rural landscapes without active farming would be acceptable means of achieving this objective.
2. *Preserve scenic values* – CVNP’s enabling legislation mandates the preservation of scenic values, which include cultural and natural elements. The preservation of agricultural lands and structures that make up the park’s rural landscape will help achieve this objective, but any action must be balanced with effects on natural scenic values.
3. *Use environmentally sound practices* – NPS policies and practices promote responsible stewardship of the land. Because the proposed action described in this document will affect the park landscape broadly, environmentally sound practices are imperative.

1.3.2. Laws, Regulations, and Policies

The resources of CVNP are protected under the authorities of the National Park Service Organic Act of 1916 (16 U.S.C. § 1), the National Park System General Authorities Act (16 U.S.C. §§ 1a-1 et seq.), Part 36 of the Code of Federal Regulations (CFR), and the park's enabling legislation (Public Law 93-555).

1.3.2.1. The No Impairment Standard

The NPS Organic Act directs the NPS to manage the parks “to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations”.

Both the NPS Organic Act and the General Authorities Act prohibit an impairment of park resources. NPS *Management Policies* (NPS 2001e, Section 1.4.5) states that an impact is more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is: 1) necessary to fulfill a specific purpose identified in the establishing legislation or proclamation of the park; 2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or 3) identified as a goal in the park’s general management plan or other relevant NPS planning documents. An impact would be less likely to constitute impairment to the extent that it is an unavoidable result of an action necessary to preserve or restore the integrity of park

resources or values, which cannot reasonably be further mitigated. Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including opportunities that otherwise would be present for the enjoyment of those resources.

The “park resources and values” that are subject to the no-impairment standard include: the park’s scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals. The NPS also includes the park’s role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system among the values subject to the no impairment standard.

1.3.2.2. Other Relevant Laws and Regulations

The following laws, regulations, and policies provide the legal framework authorizing decision-making regarding the management of the rural landscape on federal lands (see Appendix B).

The Antiquities Act of 1906 provided for protection of historic, prehistoric, and scientific features on federal lands, with penalties for unauthorized destruction or appropriation of antiquities; authorized the President to proclaim nation monuments; authorized scientific investigation of antiquities on federal lands subject to permit and regulations.

The Historic Sites Act of 1935, among other things, authorizes the NPS to “restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archaeological significance.”

The National Historic Preservation Act (NHPA) of 1966, as amended, declared historic preservation as a national policy and authorized the Secretary of the Interior to expand and maintain a National Register of Historic Places that would include properties of national, state, and local historic significance. The Act recommends that federal agencies proposing action consult with the State Historic Preservation Officer regarding the existence and significance of cultural and historical resource sites.

The National Environmental Policy Act (NEPA) of 1969, as amended, requires detailed and documented environmental analysis of proposed federal actions that may affect the quality of the human environment.

The Archaeological and Historic Preservation Act of 1974 (P.L. 93-291; 88 Stat. 174) amended the 1960 Reservoir Salvage Act; provided for the preservation of significant scientific, prehistoric, historic and archaeological materials and data that might be lost or destroyed as a result of federally sponsored projects; provided that up to one percent of project costs could be applied to survey, data recovery, analysis, and publication.

Public Law 93-555, an act to provide for the establishment of Cuyahoga Valley National Recreation Area, December 27, 1974. Section 4 (d) states that the Secretary, in consultation with the Governor of the State of Ohio, shall inventory and evaluate all sites and structures within the recreation area having present and potential historical, cultural, or architectural significance and shall provide for appropriate programs for the preservation, restoration, interpretation, and utilization of them.

The Clean Water Act of 1977 (also known as Federal Water Pollution Control Act Amendments of 1972, as amended) established the basic structure for regulating discharges of pollutants into the waters of the United States, required water quality standards and made it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit was obtained under its provisions.

The Endangered Species Act of 1978, as amended, prohibits federal actions from jeopardizing the existence of federally-listed threatened or endangered species or adversely affecting designated critical habitat. Federal agencies must consult with the U.S. Fish and Wildlife Service to determine the potential for adverse effects. Federal agencies are also responsible for improving the status of listed species.

The Archaeological Resources Protection Act (ARPA) of 1979 (P.L. 96-95; 93 Stat. 712) defined archaeological resources as any material remains of past human life or activities that are of archaeological interest and at least 100 years old; required federal permits for their excavation or removal and set penalties for violators; provided for preservation and custody of excavated materials, records, and data; provided for confidentiality of archaeological site locations; encouraged cooperation with other parties to improve protection of archaeological resources. Amended in 1988 to require development of plans for surveying public lands for archaeological resources and systems for reporting incidents of suspected violations.

The Farmland Protection Policy Act (FPPA) of 1980 was created to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of farmland to non-agricultural uses.

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990. These regulations address the rights of lineal descendants, Indian tribes, and native Hawaiian organizations to Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. They require federal agencies and institutions that receive federal funds to provide information about Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony to lineal descendants, Indian

tribes, and native Hawaiian organizations and, upon presentation of a valid request, dispose of or repatriate these objects to them.

Executive Order (EO) 11593 instructs all federal agencies to support the preservation of cultural properties and directs them to identify and nominate to the National Register cultural properties under their jurisdiction and to “exercise caution...to assure that any federally-owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered.”

EO 11988 directs federal agencies to protect, preserve, and restore the natural resources and functions of floodplains; avoid the long- and short-term environmental effects associated with the occupancy and modification of floodplains; and avoid direct and indirect support of floodplain development and actions that could adversely affect the natural resources and functions of floodplains or increase flood risks.

EO 11990 directs federal agencies to minimize impacts and mitigate the destruction, loss, or degradation of wetlands; preserve, enhance and restore the natural and beneficial values of wetlands; and avoid direct and indirect support of new construction in wetlands.

EO 12898 directs federal agencies to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

EO 13112 requires that federal agencies act to prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause.

Part 36 of the CFR provides for the proper use, management, government, and protection of persons, property, and natural and cultural resources within areas under the jurisdiction of the NPS. However, some particularly relevant sections are noted here:

36 CFR 18 (NHPA of 1966), “Leases and Exchanges of Historic Property,” govern the historic property leasing and exchange provisions of this law.

36 CFR 60 (NHPA and EO 11593), “National Register of Historic Places,” addresses concurrent state and federal nominations, nominations by federal agencies, and removal of properties from the National Register.

36 CFR 63 (NHPA and EO 11593), “Determinations of Eligibility for inclusion in the National Register of Historic Places,” establishes process for federal agencies to obtain determinations of eligibility on properties.

36 CFR 65 (Historic Sites Act of 1935), “National Historic Landmarks Program,” establishes criteria and procedures for identifying properties of national significance,

designating them as national historic landmarks, revising landmark boundaries, and removing landmark designations.

36 CFR 67 (Historic Preservation Certification Pursuant to the Tax Reform Act of 1976, the Revenue Act of 1978, the Tax Treatment Extension Act of 1980, and the Economic Recovery Tax Act of 1981), establishes procedures whereby owners or holders of long-term leases for old and/or historic buildings may obtain certification to gain federal tax credits for rehabilitation.

36 CFR 68 (NHPA) contains the Secretary of the Interior's standards for historic preservation projects, including acquisition, protection, stabilization, restoration, and reconstruction.

36 CFR 79 (NHPA and ARPA). "Curation of Federally-owned and Administered Archeological Collections," provides standards, procedures and guidelines to be followed by federal agencies in preserving and providing adequate long-term curatorial services for archeological collections of prehistoric and historic artifacts and associated records that are recovered under Section 110 of the NHPA, the Reservoir Salvage Act, ARPA and the Antiquities Act.

36 CFR 800 (NHPA and EO 11593), "Protection of Historic and Cultural Properties," includes regulations of the Advisory Council on Historic Preservation to implement Section 106 of the NHPA as amended, and presidential directives issued pursuant thereto.

40 CFR 1500-1508 (Council on Environmental Quality NEPA regulations of 1978) - provides Regulations for Implementing the Procedural Provisions of NEPA.

43 CFR 3 (Antiquities Act) establishes procedures to be followed for permitting the excavation or collection of prehistoric and historic objects on federal lands.

43 CFR 7, Subparts A and B (ARPA, as amended), "Protection of Archaeological Resources, Uniform Regulations" and "Department of the Interior Supplemental Regulations," provides definitions, standards, and procedures for federal land managers to protect archaeological resources and provides further guidance for Interior bureaus on definitions, permitting procedures, and civil penalty hearings.

Special Directive 82-12, "Historic Property Leases and Exchanges," elaborates on the leasing and exchange of historic properties under Section 111 of the NHPA of 1966 as amended.

1.4. SCOPING PROCESS AND PUBLIC PARTICIPATION

1.4.1. Scoping Activities

When a federal agency considers taking an action that may impact the human environment, NEPA triggers an information collection process by which all relevant issues and concerns, as well as alternatives to the action, are collected. This process, which is called "scoping", includes the review of all relevant planning and management documents, consultation and discussion with interested agencies, tribes and organizations, and public input. The scoping process for this document is described in this section and summarized in Appendix C.

Since 1999, the NPS has conducted preliminary internal and external scoping activities to discuss the management of the park's rural landscape by meeting with other agencies, organizations, and individuals. Through these preliminary scoping activities, the NPS proposed a change in the rural landscape management practices at CVNP.

When the proposed changes were identified as potentially affecting the human environment, the NPS decided to prepare an environmental assessment for the proposed action in May 2001. Environmental Assessments (EA) are written when the potential environmental impacts of an action are unknown. Formal scoping activities began for the EA in May 2001. Letters to natural and cultural resource agencies and organizations were mailed and a press release to major media outlets was issued. The letters and releases suggested a range of alternatives for rural landscape management. Twenty comments were received and several newspapers carried editorials and letters from the public on the issue. The NPS soon decided that due to the scale and complexity of the proposed action and the possibility that significant impacts may result from the action, the preparation of an EIS would be required. Public and agency comments received during the EA scoping process were summarized and kept for use in the EIS scoping process.

The NPS initiated the process of preparing an environmental impact statement for rural landscape management in CVNP by publishing a Notice of Intent (NOI) in the *Federal Register* on July 27, 2001. The NOI suggested a range of alternatives for rural landscape management, noted that public meetings were to be scheduled, and directed the public to a special park website for more information. Subsequently, a press release containing similar information was issued to approximately 160 local media contacts and to a list of 400 individuals who had expressed specific interest in park agricultural activities. The press release and the summary of issues and alternatives identified during the EA scoping process were placed on the park website. Additionally, letters specifically requesting input were mailed to 93 natural and cultural resource agencies, agricultural groups, local municipalities, universities, tribes, organizations, and 26 individuals. Two public open houses held on August 22, 2001 were attended by approximately 40 people. Public input was accepted until September 11, 2001. Seventeen written comments were received.

1.4.2. Environmental Issues Identified During Scoping and Evaluated

The public and other agencies identified many environmental issues associated with the proposed action during the scoping process. NEPA requires that only important issues, (i.e., those with the potential for significant or severe impacts) are to be discussed in an environmental impact statement, and that the discussion of unimportant issues be minimized or eliminated. Table 1.3 includes a summary of rural landscape management issues considered to be important and their corresponding impact topics.



Fabbeo Barn is one of four properties included in the Countryside Initiative pilot project. This barn is associated with the Leyser Farmstead.

Table 1.3. Environmental Issues to be Evaluated and Corresponding Impact Topics

Description of Environmental Issue or Concern Related to Rural Landscape Management Activities	Corresponding Topics in Chapter 4: Environmental Consequences
New construction, modifications to existing structures and lands, and changes in management methods may affect cultural resources such as historical and non-historical sites and structures, cultural landscapes, and archaeological resources.	Impacts on Cultural Resources Section 4.1
Park structure use and availability may change availability for other uses.	Impacts on Cultural Resources Section 4.1
Native vegetation may be adversely affected by reducing and changing habitats, increasing fragmentation of habitats, and through direct physical disturbance.	Impacts on Vegetation Section 4.2
Native wildlife distribution and behavior may be adversely affected by changing habitat and food availability, increasing fragmentation of habitats, fence construction, and through physical, visual, or noise disturbances.	Impacts on Wildlife Section 4.3
Ecosystems may suffer undesirable impacts from the introduction and facilitation of exotic species and diseases, hybridization between crops and livestock and native species, or through disproportionate beneficial effects on certain native species.	Impacts on Wildlife Impacts on Vegetation Sections 4.2 & 4.3
Rare, threatened or endangered wildlife and vegetation and their habitats may be impacted.	Impacts on Wildlife Impacts on Vegetation Sections 4.2 & 4.3
Human-wildlife conflicts may increase with increased agricultural activity.	Impacts on Wildlife Impacts on Social Environment Sections 4.3 & 4.5
The quality and quantity of surface and ground water resources may be diminished through encroachment on wetlands and riparian areas, use of floodplains, increasing pesticide and nutrient run-off, and drawing water for farm uses.	Impacts on Water Resources Section 4.4
Visitor and employee safety may be affected by increases in the presence of guardian animals, electric fencing, and human-wildlife conflicts.	Impacts on Social Environment Section 4.5
The quality of visitor experiences may be affected by changes in scenic values and aesthetics.	Impacts on Social Environment Section 4.5
Visitors may experience changes in recreational and educational opportunities.	Impacts on Social Environment Section 4.5
Local municipalities, current farmers and leaseholders, and local businesses may be economically affected by the addition of new farms to the park.	Impacts on Social Environment Section 4.5

1.4.3. Issues Considered But Not Evaluated Further

If an issue was considered to be outside the scope of this environmental impact statement, or the best available scientific evidence suggested that it would experience only negligible impacts, it was eliminated from further study, as required under NEPA. The issues not evaluated further follow.

Appropriateness of Agriculture in National Parks. Some members of the public have questioned whether agriculture or farming activities is appropriate or authorized in a national park. As discussed in Section 1.2.4.2, NPS policy permits agricultural activities. Section 1.2.4.3. outlines the specific park mandate for preserving the historical activity of agriculture in CVNP. This issue will not be considered further in this EIS.

Impacts on Floodplains. The proposed action may result in minor changes in the vegetative characteristics of the Cuyahoga River that could affect floodplain function. Of more than 3,800 acres of the Cuyahoga River's 100-year floodplain in the park, the proposed action would only place an additional 1 percent of the floodplain (approximately 45 acres) into active management. All managed areas would remain largely vegetated and otherwise largely undeveloped. Since no new construction or increases in impervious surfaces are anticipated in the floodplain under the proposed action, any impacts on floodplain function are considered negligible and will not be assessed further. Any unforeseen new construction in the 100 or 500-year floodplain would undergo appropriate site-level environmental review as required under EO 11988 and NEPA.

Impacts of Noise, Odors, and Dust. The proposed action may result in temporary, localized minor noise, odor, and dust disturbances for visitors and park staff from mowers or farm machinery, livestock, audio wildlife deterrents and other agricultural practices. The impact on humans is considered negligible. The impacts of noise on wildlife are discussed in Section 4.3 - Impacts on Wildlife. Noise impacts from specific recreational activities such as concerts or festivals that might be held on farmsteads will be reviewed as is done for other such activities on park land through individual NPS Special Use Permit issuance.

Impacts of Water Use. The proposed action may result in the drawing of water from the Cuyahoga River and its tributaries and from groundwater sources. Such uses will comply with NPS Management Policies (NPS, 2001e, Section 4.6.2) and relevant Ohio water rights laws. A reasonable use doctrine will be followed to ensure that park uses of water do not adversely affect downstream uses. As such, no discernable impacts on surface waters or groundwater are expected from the proposed action. The use of farm ponds as water sources is analyzed in Section 4.4 - Impacts on Water Resources.

Impacts of Food Production. The proposed action may increase the sale and distribution of foods within the park. It is possible that this increase in food production could increase impacts on public health. Any farming enterprise engaging in food preparation would be subject to the appropriate State, County and local government laws and regulations regarding handling, preparation, distribution, and other food safety-

related issues. As a result, these impacts are considered negligible and will not be discussed further.

Impacts on Employee Health and Safety. The proposed action may result in an increase in health and safety risks for NPS employees or contractors involved in building rehabilitation and field clearing or mowing. Changes in the landscape (e.g., new fencing) could lead to worker accidents. Since the NPS is subject to the requirements of the Occupational Safety and Health Administration and regularly scheduled worker safety training and updates on new construction are ongoing, these impacts are expected to be negligible and will not be discussed further.

Impacts of Vehicular Traffic Changes. The proposed action may result in a slight increase in farm-related traffic along some roads and park trails compared to current levels. Additional mowing equipment and farm machinery may travel along park roads and trails periodically to access fields not associated with other access routes. Increased visitation to view farms or purchase farm products may increase road traffic levels. Temporary, localized short-term changes in traffic patterns associated with special farm events may briefly disrupt traffic flow. Any of these traffic changes may cause brief, temporary delays for park commuters and may somewhat increase vehicle-related wildlife mortality. Any such adverse impacts related to changes in traffic are considered to be negligible and will not be discussed further.

Impacts from Lead Paint Removal. Lead paint removal will occur during structure rehabilitation and property maintenance under all alternatives. Since standard removal procedures adhere to the CVNP "Lead-Based Paint Abatement" (June, 2001) guidelines that follow the Secretary of the Interiors Standards for Historic Preservation and are based on NPS Preservation Briefs, adverse impacts are considered to be negligible and will not be discussed further.

Wildlife Diseases. The potential for spread of diseases between livestock and wildlife populations is expected to increase primarily for Alternatives 2 and 4, in which farming through long-term lease or by NPS may increase the amount of livestock present in the park. However, most important livestock diseases such as foot and mouth, brucellosis, chronic wasting disease, avian flu or avian cholera, are more often initially transmitted among livestock or from wildlife to livestock rather than from livestock to wildlife. Occurrence of most of these diseases is monitored closely in livestock in the U.S. It is probable that all livestock owners under these two alternatives would take precautions to immunize or otherwise protect their animals from these diseases, thereby reducing or eliminating the potential for infection of wildlife from livestock.

The number of domestic dogs in the park could also be increased under Alternatives 1 or 2, particularly if guardian dogs are used frequently as wildlife deterrents. Rabies, distemper, and parvo virus could be spread between wildlife and domestic dogs. However, this increased number of dogs is expected to be small relative to the population of dogs in and around the park. Also, dog owners are all expected to comply with immunization requirements, again reducing the potential for spread of disease to wildlife.

For these reasons, the potential for increased risk of diseases to wildlife is expected to be negligible or absent under the proposed alternatives and it will not be analyzed further.

Feral Livestock and Livestock Hybridization with Wildlife. The increased number of livestock expected in Alternatives 2 and 4 could increase the potential for escaped livestock that could hybridize with wildlife species. The greatest risk of this probably comes from domestic turkeys or other poultry that could conceivably hybridize with wild populations. However, it is highly unlikely under any alternatives that poultry can truly be free-ranging and still survive predation from coyotes, raccoons, or other wildlife. Thus, under all alternatives farmers with livestock will need to employ methods (fencing, penning) to prevent depredation and thereby also minimize escape potential. Although potential for isolated incidences of livestock escapes may still exist, (indeed some domestic fowl are known to inhabit the park), the impacts of a few escaped individuals (if they actually survived to breed) on wildlife population genetics are expected to be negligible or absent.

Increased numbers of dogs in alternatives 1 and 2 could increase chances of coyote-dog (“coy-dog”) hybridization. Coy-dogs are supposedly more aggressive and pose greater danger to humans, pets, and livestock than coyotes. However, the abundance of coy-dogs in Ohio is estimated to be less than 3 percent of the entire coyote population (Weeks et al. 1990). Also, as stated above, the relative increase in numbers of dogs under these alternatives should be minimal. Thus, the risk of hybridization and potential detriment to the gene pool of individual wildlife species is expected to be negligible or absent under all alternatives and will not be further addressed.

Impacts on Prime and Unique Farmland. The proposed action may include the restoration and active management of land that may be identified as “prime and unique farmland” under the FPPA. However, no “unnecessary and irreversible conversion of farmland to non-agricultural uses” is planned under this action. Therefore, no compliance with the FPPA is required. Indeed, the specific effects of the proposed action on all farmland resources in the park are analyzed throughout this document.

Impacts on Soils. The proposed action may affect the structure and quality of soils within agricultural areas in terms of fertility, chemical and nutrient levels, pH, drainage and soil microfauna. Localized impacts from cultivation, disturbance, soil additives, fertilizers, and pesticides may be expected. Soil conditions may benefit from the sustainable farming practices prescribed under Alternative 2 or be negatively affected by continuing conventional agricultural uses that are expected under Alternatives 1 and 4. Considering the long history of park land use and the resulting mosaic of soil types and conditions, the NPS requirements that all agriculture follow ‘best management practices’ (Appendix B), and that any impacts would be limited in scope and localized, these impacts are expected to be negligible and therefore are not analyzed further. The specific issue of soil sedimentation is analyzed in Section 4.4 as it relates to water resources.

Other Mandatory EIS Topics. No significant issues regarding energy requirements and conservation potential, urban quality, socially or economically disadvantaged populations

(Environmental Justice - Executive Order 12898), or urban quality were identified during scoping. No World Heritage sites, sacred sites, or Indian Trust Resources exist within the park. One National Natural Landmark exists in the park (Tinker's Creek Gorge), but it is not located within or near the proposed project area. These topics will therefore not be addressed further.